

EXHIBIT 3

DODGE LAW FIRM, INC.
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February 27, 2019

Sent via Email & First Class Mail

Peter M. Durney, Esq.
CORNELL & GOLLUB
75 Federal Street
Boston, Massachusetts 02110

RE: *Junior Williams vs. Kawasaki Motor Corp, USA, et al.*

Dear Peter:

I apologize for the delay in responding to your letter of January 11, 2019 concerning the 30(b)(6) depositions of KHI that were remitted to you by my office. I have reviewed your letter and respond as follows:

First, with regard to the timing and location of the depositions, we would agree to conducting the depositions in Southern California in June or July of this year. However, I see no reason to place a six (6) hour limit on the depositions, especially since we may be utilizing an interpreter which always extends the length of the deposition. Please know that I have no interest in extending the deposition beyond six (6) hours and will do my best to keep it to that time.

As far as the document requests, we respond as follows:

1. DESIGN DOCUMENTS concerning bracket/tank part 32052 and any attaching bolts, collars or sockets for the 2006-2010 KAWASAKI NINJA ZX-6RR(ZX600N6F).

Thank you for clarifying that the "part" number is actually a reference number. The reference number 32052 would appear to be the same part for 2007-2008, a different part for 2009, 2010, 2011 & 2012 and a third part for the year 2013. We will agree to keep the document request to the specificity of "documents outlining material specifications, mechanical specifications, CAD drawings, blueprints, shop drawings, patents." However we would prefer that you produce documents for what appears to be three (3) different "parts" again, the 2007-2008 part, a 2009, 2010, 2011, 2012 part and the 2013 part. [Please see attached drawings]

2. DOCUMENTS concerning the change in design of bracket/tank part 32052 and any attaching bolts, collars or sockets for the years 2006-2010.

What we're looking for in number 2 is any written communications concerning the change from the 2007-2008 part to the 2009-2012 part and then to the 2013 part.

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3. DOCUMENTS concerning testing of bracket/tank part 32052 and any attaching bolts, collars or sockets for the years 2006-2010

I believe our definition of documents that have to do with testing are quite clear. Any testing of the referenced part number that were conducted including material testing and strength testing.

4. DESIGN DOCUMENTS concerning fuel tank part 51085 and any attaching bolts, collars or sockets for the 2006-2010 KAWASAKI NINJA ZX-6RR(ZX600N6F) .

Thank you for clarifying that the "part" number is actually a reference number. We will agree to dispense with the reference/part number with regard to the fuel tank and just refer to this as the "fuel tank", which would include regular size and oversized fuel tanks for the years 2006-2013. We will agree to keep the document request to the specificity of "documents outlining material specifications, mechanical specifications, CAD drawings, blueprints, shop drawings, patents."

5. DOCUMENTS concerning the change in design of fuel tank part 51085 for the years 2006-2010

Thank you for clarifying that the "part" number is actually a reference number. We will agree to dispense with the reference/part number with regard to the fuel tank and just refer to this as the "fuel tank", which would include regular size and oversized fuel tanks for the years 2006-2013. We will agree to keep the document request to the specificity of "documents outlining material specifications, mechanical specifications, CAD drawings, blueprints, shop drawings, patents."

6. DOCUMENTS concerning testing of fuel tank part 51085 and any attaching bolts, collars or sockets for the years 2006-2010.

Thank you for clarifying that the "part" number is actually a reference number. We will agree to dispense with the reference/part number with regard to the fuel tank and just refer to this as the "fuel tank", which would include regular size and oversized fuel tanks for the years 2006-2013. We will agree to keep the document request to the specificity of "documents outlining material specifications, mechanical specifications, CAD drawings, blueprints, shop drawings, patents." We will further agree that documents unrelated to possible fuel leakage, breach of the fuel tank or fires will not be produced.

7. The factory service & parts manual for 2006-2010 KAWASAKI NINJA ZX-6RR(ZX600N6F)

You have agreed to produce these manuals, we would like to extend this to 2006-2013.

8. The owners manual for 2006-2010 KAWASAKI NINJA ZX-6RR(ZX600N6F)

You have agreed to produce these manuals, we would like to extend this to 2006-2013.

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As for the Deposition topics:

We have resolved the "part" number issues and we will agree to limit the deposition topics to the fuel system, fuel leakage and fuel fires as long as we agree that there may be questions related to how other parts of the bike may have been involved in the sequence of a fuel tank breach or fire.

We would like to have KHI agree to produce the documents three to four weeks in advance of the scheduled deposition(s).

Lastly, our experts believe that, in order to conduct a thorough investigation into the rupture of the subject tank, the subject tank needs to be cut into 2 parts. Our experts are certain that a "clean" cut would not impact the ability to display the tank for the jury. Please advise my office by March 15, 2019 if you have any objection to this destructive testing of the tank by BEAR Engineering. We will, of course, coordinate with your experts and produce a protocol in advance.

Please review the above and contact me with any questions you may have.

Sincerely,

DODGE LAW FIRM, INC

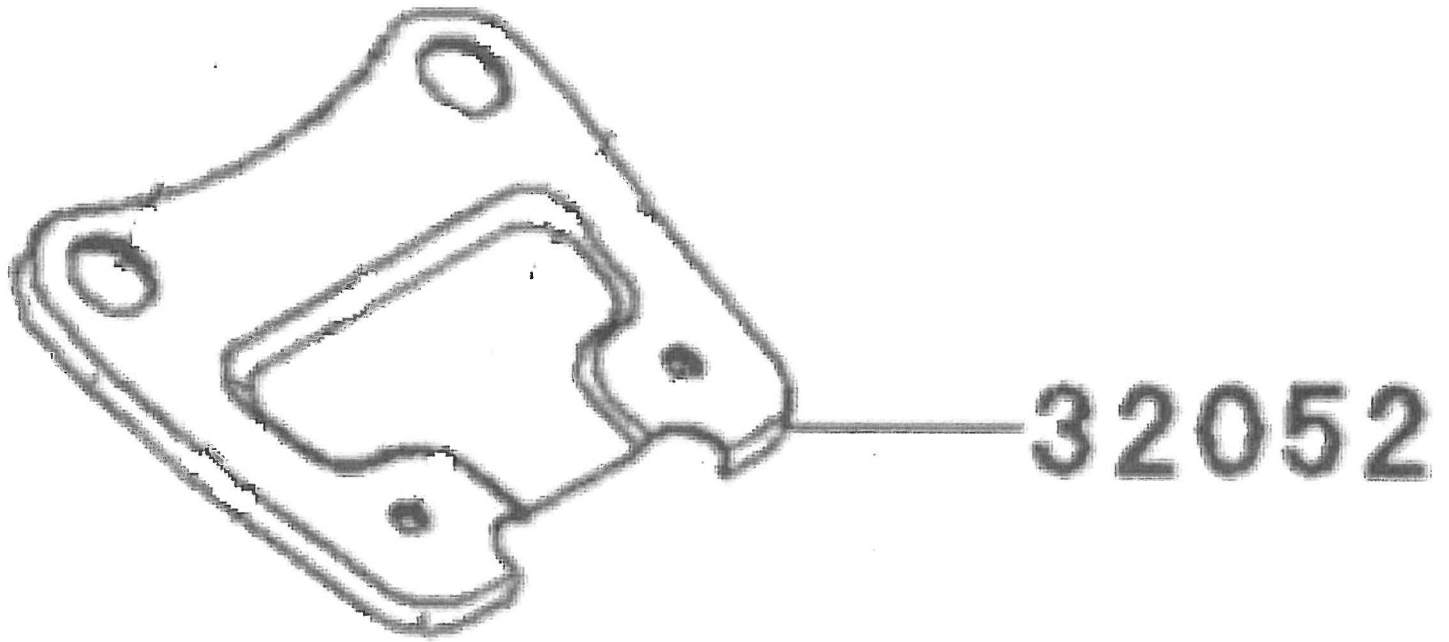
By 

Terrence L. Butler

TLB/mp

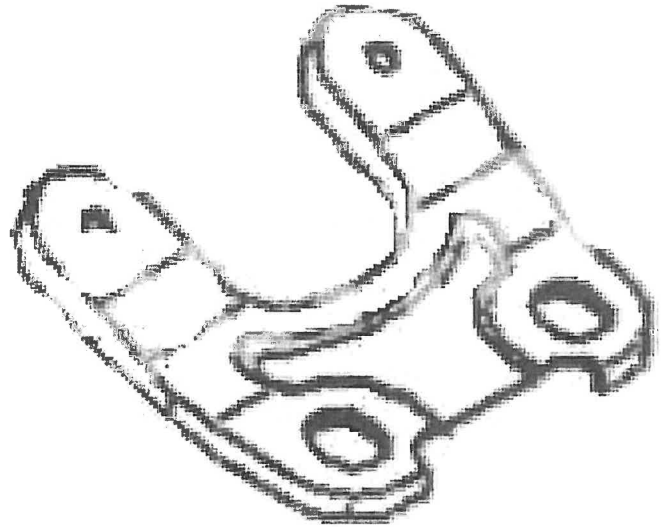
cc: John Greenwood

Attachments

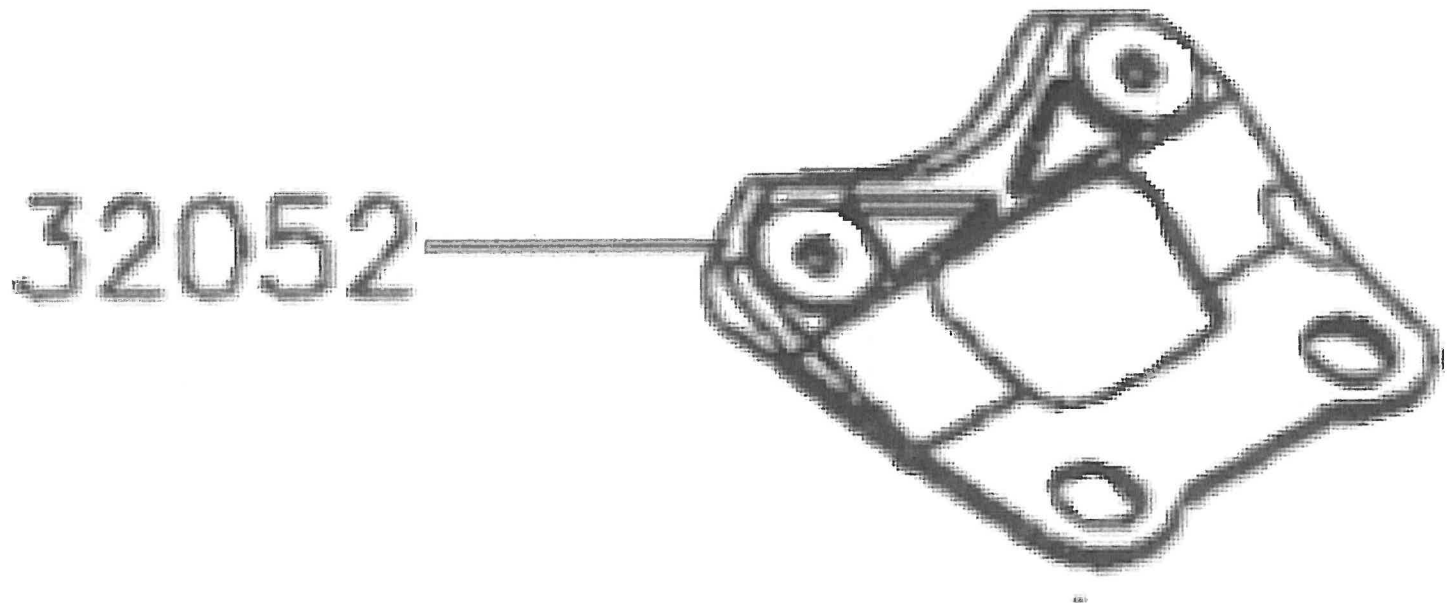


2007-2008

32052—



2009-2012



2013